

FILED

APR 16 2014

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RICHARD GOLDMAN,

Defendant.

No.

4:14CR00111 CDP/TIA

INDICTMENT

COUNT ONE

The Grand Jury charges that:

Between on or about January 1, 2011 and on or about March 31, 2014, in the City of St. Louis in the Eastern District of Missouri and elsewhere, the defendant,

RICHARD GOLDMAN,

did knowingly and willfully execute a scheme and artifice to defraud the Veterans Healthcare Administration (VHA) which is a health benefit plan, as that term is used and defined in 18 USC Section 24(b), of money, in connection with the delivery of and payment for health care benefits, items and services. It was a part of the scheme that the defendant was a registered nurse employed at the John Cochran Medical Center, a facility of the Veterans Healthcare Administration in St. Louis, Missouri. It was further part of the scheme that, from time to time, the defendant submitted false claims for payment to the VHA plan for pain medication for patients without a prescription for such medication which pain medication the defendant stole and took himself. It was further part of the scheme that, from time to time, the defendant stole pain medication prescribed to patients, using part of all of a prescribed amount himself, and submitted claims for payment for the same to the VHA plan.

All in violation of Title 18, United States Code Section 1347.

COUNT TWO

The Grand Jury further charges that:

On or about March 4, 2014, in the Eastern District of Missouri and elsewhere,

RICHARD GOLDMAN,

during and in relation to the offense of health care fraud as set forth in Count I, did knowingly use without lawful authority, a means of identification of W.B., to wit: the name and patient information of W.B.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THREE

The Grand Jury further charges that:

On or about March 5, 2014, in the Eastern District of Missouri and elsewhere,

RICHARD GOLDMAN,

during and in relation to the offense of health care fraud as set forth in Count I, did knowingly use without lawful authority, a means of identification of W.A., to wit: the name and patient information of W.A.

In violation of Title 18, United States Code, Section 1028A(a)(1).

A TRUE BILL

FOREPERSON

RICHARD G. CALLAHAN
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